

EXHIBIT D

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in Involunta Pg 1 of 1

**UNITED STATES BANKRUPTCY COURT
Southern District of New York**

In re:
Kossoff PLLC

Bankruptcy Case No.: 21-10699-dsj

Debtor*

CHAPTER: 7

Social Security No.:
Taxpayer ID/Employer ID/Other Nos.:

SUMMONS TO DEBTOR IN INVOLUNTARY CASE

To the above-named debtor:

A petition under title 11, United States Code was filed against you on 4/13/21 in this Bankruptcy Court, requesting an order for relief under Chapter 7 of the Bankruptcy Code (title 11 of the United States Code.)

YOU ARE SUMMONED and required to submit to the Clerk of the Bankruptcy Court, a motion or answer (attorneys should file online) to the petition within 21 days after the service of this summons. A copy of the petition is attached.

Address of Clerk:

**United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408
www.nysb.uscourts.gov**

At the same time, you must also serve a copy of the motion or answer upon the petitioner's attorney.

**Name and Address of
Petitioner's Attorney:**

**Aaron R. Cahn
Carter Ledyard & Milburn LLP
2 Wall Street
New York, NY 10005**

If you make a motion, your time to answer is governed by Federal Rule of Bankruptcy Procedure 1011(c).
If you fail to respond to this Summons, an order for relief will be entered.

Vito Genna

Clerk of the Court

Dated: 4/13/21

By: /s/ Humberto Cales

Deputy Clerk

*Set forth all names, including trade names, used by the debtor within the last 8 years. (Federal Rule of Bankruptcy Procedure 1005). For joint debtors, set forth both social security numbers.

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Fill in this information to identify the case:

United States Bankruptcy Court for the:

SOUTHERN District of NEW YORK
(State)Case number (if known): Chapter 7☐ Check if this is an amended filing

Official Form 205

Involuntary Petition Against a Non-Individual

12/15

Use this form to begin a bankruptcy case against a non-Individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against an individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed

1. Chapter of the Bankruptcy Code

Check one:

- ☒ Chapter 7
☐ Chapter 11

Part 2: Identify the Debtor

2. Debtor's name

KOSSOFF PLLC

3. Other names you know the debtor has used in the last 8 years

Include any assumed names, trade names, or doing business as names.

4. Debtor's federal Employer Identification Number (EIN)

☒ Unknown

EIN

5. Debtor's address

Principal place of business

Mailing address, if different

217 Broadway
Number Street

Number Street

#401

P.O. Box

New York
CityNY 10007
State ZIP Code

City State ZIP Code

Location of principal assets, if different from principal place of business

New York
County

Number Street

City State ZIP Code

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13. Each petitioner's claim	Name of petitioner	Nature of petitioner's claim	Amount of the claim above the value of any lien
	<u>Gran Sabana Corp NV</u>	<u>Unreturned IOLA Fund</u>	<u>\$4,506,349.25</u>
	<u>Louis + Jeanmarie Giordano</u>	<u>Unreturned IOLA Fund</u>	<u>\$ 250,000.00</u> <u>100,000.00</u>
	<u>DECKER ASSOCIATES LLC + 118 Duane LLC</u>	<u>Misappropriated IOLA Fund</u>	<u>\$2,425,000.00</u>
	<u>Thomas G. Sneya</u>	<u>Unreturned IOLA Fund</u>	<u>\$3,300.00</u>
	Total of petitioners' claims		<u>\$7,038,649.25</u>

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at the top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each additional petitioning creditor, the petitioner's claim, the petitioner's representative, and the petitioner's attorney. Include the statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

Part 4: Request for Relief

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

Petitioners or Petitioners' Representative**Name and mailing address of petitioner**

Gran Sabana Corp NV
Name
4299 NW 36th Street, Suite 1
Number Street
Miami FL 33166
City State ZIP Code

Name and mailing address of petitioner's representative, if any

Giorgio Angelini
Name
4299 NW 36th Street, Suite 1
Number Street
Miami FL 33166
City State ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04/12/2021
MM / DD / YYYY

X [Signature] Manager
Signature of petitioner or representative, including representative's title

Attorneys

Aaron R. Cahn
Printed name
Carter Ledyard + Milburn LLP
Firm name, if any
2 Wall Street
Number Street
New York NY 10005
City State ZIP Code

Contact phone (212) 238-1629 Email cahn@clm.com

Bar number 1329424

State New York

X

Signature of attorney

Date signed
MM / DD / YYYY

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Debtor KOSSOFF PLLC Case number (if any) _____

Name and mailing address of petitioner

Name LOUIS + JEANMARIE GORDINO
48 STRONG PLACE
 Number Street
BROOKLYN NY 11231
 City State ZIP Code

Printed name _____

Firm name, if any _____

Number Street _____

City _____

State _____

ZIP Code _____

Contact phone _____

Email _____

Bar number _____

State _____

Name and mailing address of petitioner's representative, if any

Name _____
 Number Street _____
 City State ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04/14/2021
MM / DD / YYYY

X [Signature] + Jeanmarie Gordino
 Signature of petitioner or representative, including representative's title

X

Signature of attorney _____

Date signed _____

MM / DD / YYYY

Name and mailing address of petitioner

C/O DECKER ASSOCIATES LLC + 118 DUANE LLC
 Name United American Land LLC
73 Spring Street, 6th Floor
 Number Street
Newark NJ 10012
 City State ZIP Code

Printed name _____

Firm name, if any _____

Number Street _____

City _____

State _____

ZIP Code _____

Contact phone _____

Email _____

Bar number _____

State _____

Name and mailing address of petitioner's representative, if any

Name _____
 Number Street _____
 City State ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04/12/2021
MM / DD / YYYY

X [Signature]
 Signature of petitioner or representative, including representative's title
authorized member / Albert Law

X

Signature of attorney _____

Date signed _____

MM / DD / YYYY

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Debtor

KOSSOFF PLLC
Name

Case number (if known)

Name and mailing address of petitioner

Thomas G. Sneya
Name
12 East 97th Street #2J
Number Street
New York NY 10029
City State ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City State ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04/12/2021
MM / DD / YYYY

x [Signature]
Signature of petitioner or representative, including representative's title

Printed name

Firm name, if any

Number Street

City State ZIP Code

Contact phone Email

Bar number

State

x

Signature of attorney

Date signed
MM / DD / YYYY

Name and mailing address of petitioner

Name

Number Street

City State ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City State ZIP Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on
MM / DD / YYYY

x [Signature]
Signature of petitioner or representative, including representative's title

Printed name

Firm name, if any

Number Street

City State ZIP Code

Contact phone Email

Bar number

State

x

Signature of attorney

Date signed
MM / DD / YYYY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re Kossoff PLLC,

Debtor.

Case No. 21 - _____ ()

-----X
**CORPORATE DISCLOSURE STATEMENT OF
PETITIONER GRAN SABANA CORP NV**

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 7007.1-1, the undersigned petitioning creditor, a private, non-governmental corporation, certifies that the following entities are owners of more than 10% of any class of its equity:

(a) Fundación Z1, Credicorp Bank Plaza, 26th floor, Nicanor de Obarrio Avenue, 50th Street, Panama, Republic of Panama – 50%

(b) Z Corporation, Wickhams Cay 662, Road Town Tortola, British Virgin Islands – 50%

Dated: New York, New York
April 12, 2021

GRAN SABANA CORP NV

By: s/Giorgio Angelini
Name: Giorgio Angelini
Title: Manager

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United States Bankruptcy Court
Southern District Of New York

In re Kossoff, PLLC,
Debtor*

) Case No. _____
)
) Chapter 7
)

SUMMONS TO DEBTOR IN INVOLUNTARY CASE

To the above named debtor:

A petition under title 11, United States Code was filed against you in this bankruptcy court on _____ (date), requesting an order for relief under chapter 7 of the Bankruptcy Code (title 11 of the United States Code).

YOU ARE SUMMONED and required to file with the clerk of the bankruptcy court a motion or answer to the petition within 21 days after the service of this summons. A copy of the petition is attached.

Address of the clerk:

United States Bankruptcy Court
1 Bowling Green
New York, New York 10004

At the same time, you must also serve a copy of your motion or answer on petitioner's attorney.

Name and Address of Petitioner's Attorney:

Carter Ledyard & Milburn LLP
Attn: Aaron R. Cahn
2 Wall Street
New York, New York 10005

If you make a motion, your time to answer is governed by Fed. R. Bankr. P. 1011(c).

If you fail to respond to this summons, the order for relief will be entered.

_____(Clerk of the Bankruptcy Court)

Date: By: _____ (Deputy Clerk)

* Set forth all names, including trade names, used by the debtor within the last 8 years. (Fed. R. Bank. P. 1005).

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B2500E (Form 2500E) (12/15)

CERTIFICATE OF SERVICE

I, _____ (name), certify that on _____ (date), I served this summons and a copy of the involuntary petition on Jocelyne Wildenstein (name), the debtor in this case, by *[describe the mode of service and the address at which the debtor was served]*:

If service was made by personal service, by residence service, or pursuant to state law, I further certify that I am, and at all times during the service of process was, not less than 18 years of age and not a party to the matter concerning which service of process was made.

Under penalty of perjury, I declare that the foregoing is true and correct.

Date: _____

Signature _____

Print Name:

Business Address:

Aaron R. Cahn
Carter, Ledyard & Milburn LLP
2 Wall Street
New York, New York 10005
Telephone: (212) 238-8629
Facsimile: (212) 732-3232
e-mail: bankruptcy@clm.com

Attorneys for Gran Sabana Corp NV

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<hr/>		X	
	:	:	
In Re	:	:	Chapter 7
	:	:	
KOSSOFF, PLLC,	:	:	
	:	:	Case No. 21-10699 (DSJ)
	:	:	
Debtor.	:	:	
	:	:	
	:	:	
<hr/>		X	

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned appears pursuant to the rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and section 1109(b) of title 11 of the United States Code, §§ 101, *et seq.* (the "Bankruptcy Code"), in the above-captioned case on behalf of Gran Sabana Corp NV ("Gran Sabana"), and requests that all notices given or required to be given and all papers served in these cases be delivered to and served on the parties identified below at the following address:

Aaron R. Cahn
Carter Ledyard & Milburn LLP
2 Wall Street
New York, NY 10005

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Telephone: (212) 732-3200
Fax: (212) 732-3232
Email: bankruptcy@clm.com

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in these cases.

PLEASE TAKE FURTHER NOTICE that this Request for Notices, and any subsequent appearance, pleading, claim, or suit, is not intended, nor shall be deemed, to waive Gran Sabana's (i) right to have final orders in non-core matters entered only after *de novo* reviewed by a United States District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court Judge in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Gran Sabana is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: April 13, 2021
New York, New York

CARTER LEDYARD & MILBURN LLP

s/Aaron R. Cahn
Aaron R. Cahn
Carter Ledyard & Milburn, LLP
Attorneys for Gran Sabana Corp NV

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New York, NY 10005
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